

1 George F. Hand, Esq.  
2 Nevada Bar No. 8483  
3 [ghand@handsullivan.com](mailto:ghand@handsullivan.com)  
4 Samantha A. Herbeck, Esq.  
5 Nevada Bar No. 14542  
6 [sherbeck@handsullivan.com](mailto:sherbeck@handsullivan.com)  
7 **HAND & SULLIVAN, LLC**  
8 3442 North Buffalo Drive  
9 Las Vegas, Nevada 89129  
10 Telephone: (702) 656-5814  
11 Facsimile: (702) 656-9820

12 Attorneys for Plaintiff  
13 STATE FARM FIRE AND CASUALTY COMPANY as  
14 Subrogee of THOR JORGENSEN

15 **UNITED STATES DISTRICT COURT**

16 **DISTRICT OF NEVADA**

17 STATE FARM FIRE AND CASUALTY  
18 COMPANY as Subrogee of THOR  
19 JORGENSEN,

20 CASE NO.: 2:24-cv-01543-CDS-BNW

21 Plaintiff,  
22 vs.

23 **STIPULATION AND ORDER TO  
24 EXTEND DISCOVERY DEADLINES  
25 (SECOND REQUEST)**

26 SPACOM, L.L.C. dba BATCADDY LLC, a  
27 foreign limited liability company; DOES I - v,  
inclusive; ROE CORPORATIONS I - V,  
inclusive,

28 Defendants.

29 Pursuant to LR IA6-1(a), LR IA 6-2, and LR 26-3, Plaintiff STATE FARM FIRE AND  
30 CASUALTY COMPANY, as Subrogee of THOR JORGENSEN, by and through its counsel of  
31 record George F. Hand, Esq. and Samantha A. Herbeck, Esq., from the law firm of HAND &  
32 SULLIVAN, LLC and Defendant SPACOM, LLC., by and through its attorney of record Richard  
33 Waltjen, Esq. from the law firm of PYATT SILVESTRI (collectively referred to as the "Parties"),  
34 hereby stipulate and agree to extend the Discovery Deadlines in the current Discovery Plan and  
35 Scheduling Order in this matter for a period of 60 days.

36  
37 // /

1           **A. DISCOVERY COMPLETED**

2           1. Plaintiff has made initial disclosures of witnesses and documents;

3           2. Defendant has made initial disclosures of witnesses and documents;

4           3. Plaintiff has made supplemental disclosures of witnesses and documents;

5           4. Defendant has made supplemental disclosure of witnesses and documents;

6           5. Plaintiff has made their first set of interrogatories to Defendants;

7           6. Plaintiff has made their first set of requests for production of documents to

8           Defendants;

9           7. Defendant has made their responses to Plaintiff's first set of interrogatories;

10           8. Defendant has made their responses to Plaintiff's first set of requests for

11           production of documents;

12           9. Defendant has made their first set of interrogatories to Plaintiff;

13           10. Defendant has made their first set of requests for production of documents to

14           Plaintiff;

15           11. Defendant has made their first of requests for admissions to Plaintiff;

16           12. Defendant has made their second set of requests for production of documents

17           to Plaintiff;

18           13. Plaintiff has made their responses to Defendants first set of interrogatories;

19           and

20           14. Plaintiff has made their responses to Defendants first set of requests for

21           production of documents;

22           **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

23           1. Plaintiffs responses to Defendants first set of requests for admissions.

24           2. Plaintiffs responses to Defendants second set of requests for production of

25           documents.

26           3. The deposition of Defendant's 30(b)(6) Witness is currently scheduled for

27           March 11, 2025.

28           4. The deposition of Thor Jorgensen.

- 1 5. The deposition of Jette Jorgensen.
- 2 6. The deposition of Plaintiffs 30(b)(6) Witness.
- 3 7. Additional Depositions, including expert depositions, remain to be
- 4 completed by both parties
- 5 8. Additional Written Discovery remains to be completed by both parties.
- 6 9. Initial and Rebuttal Expert disclosures remain to be completed by both
- 7 parties.
- 8 10. Other further appropriate discovery may also be necessary.

9 **C. REASONS WHY DISCOVERY REMAINING WAS NOT COMPLETED**

10 The parties have been working diligently to complete discovery; however, due to the  
11 scheduling of depositions, other discovery has been delayed. Thus, although the parties have made  
12 every effort to cooperate throughout the process, they nonetheless will be unable to complete  
13 discovery before the current deadlines expire.

14 The proposed extension will provide the parties with the time needed to complete the  
15 remaining discovery necessary for the parties' claims and defenses.

16 This Request is not sought for any improper purpose or other purpose of delay. Rather, it is  
17 sought by the parties for the purpose of conducting all necessary discovery.

18   ///

19   ///

20   ///

21   ///

22   ///

23   ///

24   ///

25   ///

26   ///

27   ///

28   ///

	<b>D. DISCOVERY DEADLINES</b>	<b>Current</b>	<b>Joint Proposed Amended</b>
1	1. Close of Discovery	05/16/2025	07/15/2025
2	2. Final Dates for Expert Disclosures		
3	(a) Initial Disclosures	03/17/2025	05/16/2025
4	(b) Rebuttal Disclosures	04/15/2025	06/13/2025
5	3. Dispositive Motions	06/13/2025	08/12/2025
6	4. Pretrial Order	07/15/2025	11/12/2025
7			
8			
9			
10	<b>HAND &amp; SULLIVAN, LLC</b>		<b>PYATT SILVESTRI</b>
11	Dated: March 3, 2025		Dated: March 3, 2025
12	<u>/s/ George F. Hand</u> George F. Hand, Esq. (#8483)		<u>/s/ Richard Waltjen</u> James P.C. Silvestri, Esq (#3603)
13	Samantha A. Herbeck, Esq. (#14542)		Richard Waltjen, Esq. (#13416)
14	3442 North Buffalo Drive		7670 W. Lake Mead Blvd., Suite 250
15	Las Vegas, Nevada 89129		Las Vegas, Nevada 89128
	Attorneys for Plaintiff		Attorneys for Defendant
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

## **ORDER**

Upon Stipulation of the parties;

IT IS SO ORDERED that the discovery deadlines be extended as follows:

1.	Close of Discovery	07/15/2025
2.	Final Dates for Expert Disclosures	
	(a) Initial Disclosures	05/16/2025
	(b) Rebuttal Disclosures	06/13/2025
3.	Dispositive Motions	08/12/2025
4.	Pretrial Order	11/12/2025

Dated this 5 day of March, 2025.

Barbara A. Weisberg  
UNITED STATES MAGISTRATE JUDGE

Respectfully submitted this 3rd day of March, 2025.

**HAND & SULLIVAN, LLC**

/s/ George F. Hand  
George F. Hand, Esq.  
Nevada Bar No. 8483  
Samantha A. Herbeck, Esq.  
Nevada Bar No. 14542  
3442 N. Buffalo Drive  
Las Vegas, Nevada 89129  
Attorneys for Plaintiff

**Juliana Cerriteno**

---

**From:** Richard Waltjen <rwaltjen@pyattsilvestri.com>  
**Sent:** Friday, February 28, 2025 7:40 AM  
**To:** Juliana Cerriteno  
**Cc:** George Hand; Samantha Herbeck; Michelle Mockbee  
**Subject:** RE: State Farm v Spacom - 2:24-cv-01543 - H&S File No.: 5221.080

Good morning,

I reviewed the Second SAO to Extend Discovery Deadlines. You have my authorization to use my esignature.

Thanks

*Richard Waltjen*  
*Associate Attorney*



**PYATT SILVESTRI**  
A PROFESSIONAL LAW CORPORATION

**7670 Lake Mead Boulevard, Suite 250**

**Las Vegas, Nevada 89128**

**Telephone: (702) 383-6000**

**Facsimile: (702) 477-0088**

**[rwaltjen@pyattsilvestri.com](mailto:rwaltjen@pyattsilvestri.com)**

**[www.pyattsilvestri.com](http://www.pyattsilvestri.com)**

The information contained in this communication may be confidential or legally privileged and is intended only for the recipient named above. If the reader of this message is not the intended recipient, you are hereby notified that any dissemination, distribution or copying of this communication or its contents is strictly prohibited. If you have received this communication in error, please immediately advise the sender and delete the original and any copies from your computer system.

---

**From:** Juliana Cerriteno <Julianac@handsullivan.com>

**Sent:** Thursday, February 27, 2025 4:31 PM

**To:** Richard Waltjen <rwaltjen@pyattsilvestri.com>

**Cc:** George Hand <ghand@handsullivan.com>; Samantha Herbeck <sherbeck@handsullivan.com>; Michelle Mockbee <mmockbee@pyattsilvestri.com>

**Subject:** State Farm v Spacom - 2:24-cv-01543 - H&S File No.: 5221.080

Good Afternoon Mr. Waltjen,

Attached please find draft of SAO to Extend Discovery Deadlines for your review. If you have any requested revisions please use redlines, if none please confirm we have authority to affix your e-signature to the SAO for submission to the court. Thank you.

Sincerely,  
Juliana Cerriteno, Paralegal  
Hand & Sullivan, LLC  
**[Julianac@handsullivan.com](mailto:Julianac@handsullivan.com)**